

**EPSTEIN
BECKER
GREEN**

Attorneys at Law

Adriana S. Kosovych
t 212.351.4527
f 212.878.8600
akosovych@ebglaw.com

June 14, 2022

BY ECF

Hon. Vernon S. Broderick
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **King v. Fedcap Rehabilitation Services, Inc., et al.**
Civil Action No. 20-Civ-1784 (VSB) (ADS)
Request To Extend Deadline to Submit Status Report

Dear Judge Broderick:

We represent the Defendants, Fedcap Rehabilitation Services, Inc. (“Fedcap”) and Wildcat Service Corporation (“Wildcat”) (together, “Defendants”) in the above-identified matter. We write jointly with Plaintiff to advise the Court that the Parties’ mediation initially scheduled for June 13, 2022 with Mediator Dina Jansenson has been rescheduled to August 5, 2022, at Defendants’ request and by agreement between the parties. Accordingly, we respectfully request that the Court extend the June 20, 2022 deadline set forth in its Order dated June 2, 2022 (DE 100), until after the mediation is concluded on August 5, 2022.

Since the parties advised the Court that they had agreed to engage in private mediation and scheduled a mediation (DE 99), Defendants have worked diligently to compile a complete and accurate list of the members of the putative collective included within the conditionally certified collective as it is defined in the Court’s Opinion and Order dated February 1, 2022. (DE 95). In addition, Defendants are compiling relevant sample time and pay data, which they have agreed to produce to Plaintiff in advance of the mediation and which the parties will use to inform their respective positions at the mediation. While Defendants initially had believed that they would be able to complete this production in time for a June 13, 2022 mediation, they became aware of certain data collection issues in late May and early June which resulted in Defendants’ need for additional time to address and resolve those issues and to produce the information as agreed between the parties.

Hon. Vernon S. Broderick
June 14, 2022
Page 2

This is Defendants' first such request, and it affects no other scheduled dates. Thank you for Your Honor's consideration of this request.

Respectfully,

/s/ Adriana S. Kosovych

Adriana S. Kosovych

cc: Counsel of Record (via ECF)